



ORIGINAL

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2008

Name of company covered by this certification: **LAT, Inc.**Name of signatory: **Linda Johnson**Title of signatory: **Chief Operating Officer**

I, Linda Johnson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____


Linda Johnson, COO, LAT, Inc.

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LAT, Inc.

**Statement of Compliance
Section 64.2001**

February, 2009

LAT, Inc. (LAT) has the following procedures and policies in place to comply with the FCC's CPNI rules regarding data collected about consumers' phone calls, including the time, date, duration and destination number of each call; the consumer's service type; and any information the appears on the consumer's telephone bill.

LAT is a reseller of VoIP telephone services branded as MontanaVoice.

Call detail is provided to LAT by its upstream provider (NetLojix) in a spreadsheet format that does not include any identifying customer information other than the service telephone number.

Call detail is matched with customers via the telephone numbers for the purpose of billing. A database containing the customer names and respective telephone numbers is accessible only by select LAT staff members who have been given password-protected administrative access to the database and the upstream providers (NetLojix and NGT) for the purpose of providing support for the service.

LAT uses customers' call detail only for the purpose of billing and collecting fees for services provided.

CPNI information may be shared with the customer upon direct written request, but only upon verification of the customer's identification. Any requested CPNI information will be provided by mail to the customer's address of record or via the telephone only if an appropriate LAT staff member calls the customer at the service telephone number. No CPNI information will be disclosed to a customer visiting LAT's facility without the customer first providing a valid photo ID that matches the customer's account information on record.

LAT and its upstream providers may use consumer call detail for the purpose of troubleshooting service disruptions or call quality issues. Information utilized for this purpose may include the time of the call, the originating phone number, the destination phone number, and the duration of the call. Carriers involved in the troubleshooting processes may have access to the customer's identity via the telephone number through the upstream carrier database. Any carrier with such access is required to be CPNI compliant.

Customer's name, address, and telephone number will be submitted for inclusion in directory listings if: a) an existing phone number is ported from another service and is listed in directories; or b) the customer selects the option to have their information submitted for directory listing.

At the time of establishing a customer's service, or in the event the physical location of the service is moved, LAT will submit the customer's CPNI information, including customer name, physical address, and telephone number, to the upstream provider for submission into the E911 database.

LAT has strict employee policies in place for keeping all customer data, including call detail information, confidential. Any violation will be seriously punished according to company disciplinary policies.

LAT will not use customer information which was obtained only for the purpose of providing telecommunications services for any purpose not directly related to the providing of that service. LAT may market additional or alternate calling plans or calling features to a customer based on their service usage or needs. Such offers will be made only to existing MontanaVoice customers regarding other options within the MontanaVoice service offering.

LAT has not been approached by a data broker of any kind seeking to solicit customer data. LAT strictly prohibits the sharing of any such information with any entity with the exception of law enforcement providing a properly documented request.

LAT may have customer information stored in its database relative to services that LAT provides other than telecommunication services. This information may be used by LAT to market other services that may be of interest to the customer. LAT will not use CPNI collected solely for the purpose of providing telecommunications services for such use unless given express written permission by the customer. Any such request for permission will be given with an option for the customer to opt out.

All of LAT's internal systems and databases, including those storing telecommunication's-related CPNI, are protected from outside access with a Cisco PIX firewall. All internal access is username and password protected. The main database containing customer detail is hosted on NGT's (New Global Telecom's) platform.

LAT employees have been instructed to report any known breach of CNPI compliance to law enforcement pursuant to §64.2011.



LAT, Inc. DBA Little Apple Technologies

EMPLOYEE POLICY

CPNI (Customer Proprietary Network Information) Compliance

LAT, Inc. (LAT) is required by FCC regulation to comply with the Customer Proprietary Network Information (CPNI) ruling. This ruling provides protection of telecommunications customer information and confidentiality.

CPNI is defined as the data collected by telecommunications corporations about a consumer's telephone calls. It includes the time, date, duration and destination number of each call, the type of network a consumer subscribes to, and any other information that appears on the consumer's telephone bill.

Per the terms of the FCC's CPNI ruling, LAT has implemented and enforces the following policy with regard to employee handling of customer information.

- 1) All customer information, including name, address, telephone number, email address, calling plan, call detail, and billing information, is confidential.
- 2) Employees are not to disclose any confidential customer information to anyone except the account holder.
- 3) Information can only be released to the account holder through the following processes:
 - a. Information may be given by phone only if the employee initiates a call to the account holder using the telephone number on file for the account.
 - b. Information can be provided in writing to the e-mail address on file, the mailing address on file, or a fax number on file for the account holder.
 - i. Credit card and bank account information is never to be sent via e-mail
 - c. Information can be provided to the customer in person only after they have provided a valid photo ID verifying that they are the account holder.

If there is ANY question about the validity of a request for confidential information, the employee must get approval from their supervisor prior to releasing that information.



- 4) All printed or written documents or notes that contain confidential customer information must be run through a paper shredder prior to disposal.
- 5) Customer information is not to be stored on a laptop computer or any other form that could be removed from the LAT office with the exception of data backup for restoration.
- 6) Confidential customer information is to be used only for the purpose of providing service to the customer, billing the customer for services, or collection of money owed to LAT for services provided.
- 7) Any breach of any part of this policy must be immediately reported to management.
- 8) Employees can and will be disciplined for violation of this policy.

I have read and understand LAT's employee policy regarding CPNI. I understand that violating this policy will be considered a serious company violation. I also understand that violations of the CPNI ruling may be subject to criminal prosecution and/or fines or both. I agree to adhere to this policy and to report any potential breach of this policy to management immediately upon it becoming known to me.

Employee Signature

Date

Printed Name